

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X

DONATUS UGWUDIOBI,  
YUSUFU JAGANA,  
ANTIGHA ABIA,  
DOOYUM IGBUDU,  
CECILE MIREE,  
SEEMAJ POUGH,  
ALY ALWARS,

CIVIL ACTION NO. 22CV4930  
(PKC) (CLP)

Plaintiffs,

*on behalf of themselves and all others similarly situated,*

**AFFIRMATION IN  
SUPPORT**

-against-

INTERNATIONAL TRENDZ, LLC,  
d/b/a PRESIDENTIAL SECURITY COMPANY, and  
ISMAIL QADAR,

Defendants.

-----X

**PLEASE TAKE NOTICE** that DAVID C. WIMS, hereby declares as follows:

1. I am the attorney for Plaintiffs in this action.
2. This action was commenced pursuant to the Fair Labor Standards Act, 29 U.S.C. §§ 201 *et seq*; and the New York Labor Law for unpaid and late paid wages, *inter alia*.
3. The time for Defendant International Trendz, LLC, d/b/a Presidential Security Company, to answer or otherwise move with respect to the complaint herein has expired.
4. Defendant International Trendz, LLC, d/b/a Presidential Security Company, has not answered or otherwise moved with respect to the complaint, and the time for Defendant International Trendz, LLC, d/b/a Presidential Security Company, to answer or otherwise move has not been extended.
5. That Defendant International Trendz, LLC, d/b/a Presidential Security Company, is not an infant or incompetent. Defendant International Trendz, LLC, d/b/a Presidential Security Company, is not presently in the military service of the United States.

6. Defendant International Trendz, LLC, d/b/a Presidential Security Company, is indebted to Plaintiffs, in the following manner:

Failure to pay minimum wages promptly or at all, to Plaintiffs during their employment, including during May 2022 through August 2022; failure to pay overtime wages promptly or at all, to Plaintiffs during their employment, including during May 2022 through August 2022; and failure to provide pay statements and wage notices with each wage payment, to Plaintiffs during their employment.,

**WHEREFORE**, Plaintiffs request that the default of Defendant International Trendz, LLC, d/b/a Presidential Security Company, be noted and a certificate of default issued. I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge, information and belief, that the amount claimed is justly due to Plaintiffs, and that no part thereof has been paid.

Dated: Brooklyn, New York

January 9, 2023

\_\_\_\_\_  
/s/  
LAW OFFICE OF DAVID WIMS  
BY: David C. Wims, Esq. (DW-6964)  
*Attorneys for Plaintiffs*  
1430 Pitkin Ave., 2<sup>nd</sup> Fl.  
Brooklyn, NY 11233  
(646) 393-9550